

Section 3 – Reporting and Recordkeeping

I. Reimbursement and Client File Requirements

The purpose of this section is to inform subgrantees of specific documentation needed for each weatherization reimbursement and client file. This section also provides general guidance to subgrantees on how to comply with requirements specified in 10 CFR 440.16(g) on reporting completed homes. The State and each WAP subgrantee receiving federal financial assistance will keep records and make reports as required by 10 CFR Part 440.24 and 10 CFR Part 440.25.

The DED/DE has developed a web-based program called MoWAP to assist with reporting, tracking, data retention, etc. MoWAP can be accessed at <https://ded.mo.gov/MoWAP/index.jsp>. This program allows for subgrantees to track client files through all stages of weatherization. Required forms and documentation must be uploaded into the reimbursement and the individual client file.

DOE funds are indirectly utilized on all units through auditing, testing, inspections, use of DOE funded equipment and/or vehicles, or DOE funded training. Because of this, **a minimum of \$100 in labor/material expenditures per unit must be reported on a DOE reimbursement**. See DOE WPN 12-1 for more information. In addition, a minimum of 10% of material/labor expenditures per unit must be charged to each of the split-funded non-DOE fund sources administered by DED/DE. See Section 4, Subsection 1, Part D, 5.

II. Required Documentation to be Uploaded on the MoWAP Reimbursement

Each reimbursement must contain the following documents:

A. General Ledger/Working Papers

The general ledger/working papers (including labor and material charged to the reimbursement) must be uploaded to MoWAP. If there are reported homes that are split funded, there should be a breakdown by fund source sheet uploaded.

B. Expenditures

The expenditures on the reimbursement and the general ledger/working papers must be reviewed to ensure that they are allowable per grant guidelines. The expenditures on the reimbursement must be posted to the general ledger/working papers. The total on the general ledger/working papers **must** match the total expenditures on the MoWAP reimbursement. Any reason for variances must be noted on the general ledger/working papers.

C. Reported Homes

The general ledger/working papers should include references to the homes attached on the reimbursement, and include contract labor, crew labor, and materials. This **must** match the MoWAP reimbursement.

III. Required Forms and Documentation to be Uploaded on the MoWAP Client File

Each reported client file must contain the following documents:

NOTE: Unless there are specific DED/DE approved circumstances, these documents must be uploaded to each client file in MoWAP individually and not uploaded as multiple documents under the “All Required Documents” option. However, DED/DE understands that it may be more time consuming to upload all documents individually. For that reason, the following documents may be combined under “All Required Documents” when uploaded to MoWAP:

- The Landlord Agreement Form and Landlord Contribution
- The NEAT/MHEA Input Report and Recommended Measures
- The Mechanical Systems Audit Form, Worst Case Depressurization Form, Diagnostic Field Form, and Baseload Replacement and Ventilation Audit Form
- The Invoices and Individual Bids documents

Combined documents should be listed under the “Description” field on the MoWAP document upload screen. All other required documents should be uploaded separately.

A. The Application Form

This form is generated by MoWAP. Completed applications can be generated after the client file has completed the intake stage. Blank applications are available under the reports tab of the main menu. Signed application forms must be uploaded to the client file.

B. Applicant Social Security Card

A copy of the applicant’s social security card, or a third party form, (W2, SS/SSI letter, etc.) that clearly shows the social security number must be uploaded to the client file.

C. Proof of Income Documentation

All household income for a minimum of three calendar months prior to the date of the application must be recorded by the subgrantee to verify the income eligibility (unless income is certified by an outside federal agency, such as LIHEAP or HUD). If the application is dated April 24, for instance, all household income from January, February, and March of that year would need to be documented. **Income must be verified within three months of the application date. If not, the application must be rejected.**

NOTE: All household income must be considered, regardless of the wage earner’s age. (Please see Attachment 2-1 for more information.)

Income documentation is required for **all wage earners who reside in the home**. If an individual adult (over the age of 19) claims no income, a written statement declaring such, which is signed by that individual, is sufficient documentation and must be kept in the client file as well as uploaded to MoWAP. If no one in the home claims any income, a notarized zero-income form must be completed and signed by the applicant. **NOTE: If the applicant and/or all household members are 19 years or younger, then a notarized zero-income form must be completed and signed by the applicant.**

All household income sources must be entered on the MoWAP client file. MoWAP verifies the client's annualized income eligibility using the Poverty Income Guidelines published in the *Federal Register*.

NOTE: When calculating income based on a client's Social Security Benefit Letter, the medical insurance premium deduction, such as Medicare, is considered an income exclusion and should not be included in the income calculation. (See Attachment 2-8 for step by step instructions to obtain an on-line Social Security Benefit Statement Letter)

Bank statements may not be used for income verification. Tax returns are only allowed if the client is self-employed.

For the purposes of this program, a self-employed person will be defined as one who has income as an owner or partner in a business, or from rental real estate, royalties, or farming, reported on any of lines 12, 14, 17, or 18 on their 2014 Federal Form 1040 tax return. When a household member is self-employed, use line 22 on their Federal Form 1040 as the total annual income for that household member. (Please see Attachment 2-9. These numbers will be modified, if necessary, when the 2015 Federal Form 1040 tax return is released.) No other income documentation is required for that household member. If it is a joint tax return, line 22 will serve as the total annual income for both persons listed at the top of the tax return.

Households that contain a member who has received cash assistance payments under Title IV - *Grants To States For Aid And Services To Needy Families With Children And For Child-Welfare Services* (Temporary Assistance for Needy Families - TANF) or Title XVI - *Supplemental Security Income For The Aged, Blind, And Disabled* (SSI) of the Social Security Act or applicable State or local law at any time during the 12-month period preceding their income verification, are automatically eligible for weatherization assistance. **Social Security Disability Insurance (SSDI) is not considered SSI, and must be included in the overall household income.**

Households that have been deemed income eligible for LIHEAP assistance may use their LIHEAP eligibility as verification of income. The **only allowable document** to use as proof that the client's income was verified as "income eligible" for LIHEAP assistance is a printout of LIHEAP form E1PY (LIHEAP Payment Information screen) which the Missouri Division of Social Services/Family Support Division has made available to each subgrantee through that subgrantee's LIHEAP program. See Attachment 2-7 for an example of this document.

NOTE: If the LIHEAP E1PY form (LIHEAP Payment Information screen) shows zero income for the household, a Zero Income form does not have to be completed.

D. Reverification of Income Documentation (if applicable)

Income must be reverified if the initial verification is a year old before the home becomes a "home in progress". A home in progress is a home for which energy conservation measures (ECMs) have actually commenced. The commencement of work does not include the hanging of smoke or carbon monoxide detectors.) **Completion of an energy audit does not constitute a work start date.**

In addition, if the home does not become a “home in progress” within six (6) months of the energy audit date, the subgrantee must return to the home and perform an on-site inspection to determine if any conditions have changed, and re-run the computerized audit. (See LIWAP Technical Manual Section X, Subsection B for more information.)

In order to reverify a client’s income, the agency must have the client complete a new application and update the number of household members living in the home. The client is required to provide current income documentation for all household members, or provide eligibility documentation from another program (see C. Income Verification above). Other application documentation, such as proof of home ownership or utility bills, **are not** required for reverification. The agency will use the current WAP income guidelines to determine income eligibility. The date of reverification must be entered into MoWAP and both the original and the new applications, along with the original and reverified income documents, must be kept in the physical client file, and uploaded to MoWAP.

E. Proof of Home Ownership

Please see Section 2, Subsection V, part B3 for a listing of eligible home ownership documents. These documents must be uploaded to the client file.

F. Landlord Agreement Form and Proof of Contribution (if applicable)

This form (Attachment 2-5) provides authorization from the client's landlord that they give permission for their property to be weatherized and that they agree to specific requirements as outlined in *Section 2*. Completed landlord agreement forms can be generated on MoWAP after the client file has completed the intake stage. Blank landlord agreement forms are available under the reports tab of the main menu. Completed landlord agreement forms must be uploaded to the client file. If the landlord provides a contribution, a copy of the proof of contribution (check or agency receipt) must be uploaded to the MoWAP client file.

G. Landlord Proof of Income Documentation (if applicable)

If the requirement that the owner/landlord provide a minimum of a five percent (5%) cash contribution to the project is waived because the owner/landlord’s annual taxable income is at or below two hundred percent (200%) of the federal poverty level, then the owner/landlord’s income proving eligibility must be uploaded to the client file.

H. Utility Bill(s)

A copy(s) of the client’s utility bill(s), that clearly shows the client’s account number, must be uploaded to the client file. The address on the utility bill should match the address of the weatherized home.

I. Section 106 Documentation (if applicable)

The Section 106 Project Information Form and associated response letter(s) must be uploaded to all client files reviewed by the State Historic Preservation Office.

J. Project Photographs

At least one (1) clear photograph showing the front of the building or structure taken from the street, sidewalk or front yard must be uploaded to all client files. Additional photos of the home are encouraged.

K. Bid Documents (if applicable)

When bidding out individual items such as furnace or air conditioner replacements on a home by home basis, the three required Request for Quote (RFQ) or Request for Bid (RFB) must be uploaded to MoWAP. The RFQ's and RFB's must clearly identify the vendor/contractor in which the bids were sent. A bid tally sheet should be used (and uploaded to the client file) to document who the bids were sent to and all bids/prices received. If there was no response from a contacted vendor/contractor, note that on the bid tally sheet.

L. Invoices, Bills for Materials and Labor Charges

All invoices being charged against a home must be uploaded to the client file.

Contractor invoices must be submitted on the contractor's letterhead and should include the following information: company name, contact information, dates of service, job number and/or client's name, quantity of material and labor by unit, description of service with individual measures documented (as defined by NEAT/MHEA), and costs broken out by material and labor. **In addition, for all HVAC equipment, hot water heaters, and refrigerators, invoices must include the make, model number and serial number of the equipment.** Invoices must be uploaded to the client file and costs should easily be tracked to the contractor's bid documents. (See attachment 3-5 for an example contractor invoice)

For agencies with weatherization crews, **and no inventory**, invoices for all materials purchased for the home must be uploaded to the client file. For agencies with weatherization crews, **that do have inventories**, an inventory sheet that identifies the quantity and price of materials used for the home must be uploaded to the client file. **These prices must be able to be tracked back to the original invoice price in which they were purchased. Please note that all materials purchased for the Weatherization Program should be tax exempt.**

For agencies with weatherization crews, some sort of labor worksheet or documentation must be uploaded to the client file to document how the labor costs charged to the home were calculated. The worksheet must include the crew members that worked on the home, each crew member's hourly wage, and the specific hours each crew member worked on the home broken out by measure. Crew members must keep track of the time they spend working on each reported measure (this does not include drive time or material purchasing time; those hours, are to be charged to the Program Operations support cost budget category).

M. Client Interview & Auditor Assessment Form

This technical form is completed by the auditor at the time of the initial audit. (See LIWAP Technical Manual Attachment 2.2)

N. NEAT and MHEA Audit Data

The NEAT/MHEA Input Report and the NEAT/MHEA Recommended Measures (Output Report) that documents all energy efficiency and incidental repair measures installed in the home must be uploaded to the client file. **The Recommended Measures should not be run after the Final Inspection date without DED/DE approval.**

O. Mechanical Systems Audit Form

This form contains all required diagnostic testing information. This also includes the combustion gas analyzer printouts. (see the LIWAP Technical Manual Attachment 2.5)

P. Diagnostic Field Form

This technical form is completed both during the initial audit and the final inspection. (See LIWAP Technical Manual Attachment 2.4)

Q. Work-Order Change Notices (if applicable)

This form is an agency-developed form that should include all additions or deletions to the job. The auditor, crew supervisor, QCI, or other designated subgrantee personnel should sign and date the form. **The change notices must be documented on the MoWAP client file work order.**

R. ASHRAE 62.2 Form

This form (LIWAP Technical Manual Attachment 2.8) is an excel spreadsheet which must be completed electronically and uploaded to the client file. This spreadsheet is used to determine ventilation requirements for a home.

S. Incidental Repair Justification Form (if applicable)

This form (LIWAP Technical Manual Attachment 2.7) contains information regarding the justification and ECM association for incidental repair measures.

T. Worst Case Depressurization Form

This technical form (if applicable) is completed both during the initial audit and the final inspection. (See LIWAP Technical Manual Attachment 2.3)

U. Baseload Replacement and Ventilation Audit Form

This form (LIWAP Technical Manual Attachment 2.6) contains information regarding a home's existing refrigerator (and new refrigerator model information if a new refrigerator is installed), shower heads, incandescent lighting and mechanical ventilation.

V. Final Inspection Form

This form (LIWAP Technical Manual Attachment 2.1) contains information from the final inspection of the completed home

W. Final Inspection Attempted Contacts (if applicable)

Documentation that the agency attempted to contact a client three times within a seven to 14 day period, with two of the attempts being a minimum of seven days apart – with no success.

X. Emergency Services (if applicable)

Subgrantees may provide emergency services (those that are DOE allowed measures) on an immediate basis to clients who can provide a letter from a board certified physician (MD-Medical Doctor, DO-Doctor of Osteopathy, or ND-Naturopathic Doctor) stating that the occupant's life would be endangered due to physical conditions found in the client's home. For additional technical information regarding emergency services, please reference the LIWAP Technical Manual, Section II, Subsection B, Topic 5, 6, 7.

Households that do not have a functioning heat source, or there is a health and safety problem that may warrant shutting off a combustion appliance, (and the home does not fall within the subgrantee deferral policy; LIWAP Technical Manual, Section II, Subsection D), do not require a physician statement. During the months of **November through March**, clients that do not have a functioning heat source may receive immediate assistance, or given a higher priority on the waiting list. The subgrantee must verify that these conditions exist at the client's home, although additional verification may be requested.

Documentation of the need for emergency services and physician letters (if applicable) must be uploaded to the MoWAP client file. **The Work Order Measure Type for emergency services must be reported as "Emergency Replacement / Repair" in MoWAP client file.**

Additional policies that shall govern use of WAP funds for emergencies:

- Maximum cost limitations will be followed as with service to other clients.
- Only clients who are (1) eligible for the WAP and (2) on a subgrantee waiting list will receive services.

Y. DED Approval (if applicable)

Documentation of approval for case-by-case exceptions to policy granted from DED/DE or DOE must be uploaded to the client file.

IV. Required Forms and Documentation for the Physical Client File

A. Agency Work Order Form

This form is an agency-developed form identifying the estimated materials and work to be completed, and a list of actual costs for materials and labor for the completed job. The work order form can also be printed from the NEAT and MHEA Audit software. This form should be signed and dated by a weatherization auditor.

B. Heating System Information to Include:

- Clean and Tune Work Order Form (if applicable) (see the *Procurement section*)

V. Required Forms and Documentation for Contractor Files

- A. A completed contract which has been signed by the contractor and countersigned by the agency.
- B. Evidence that the contractor has met one of the three following criteria:
 1. The respondent has successfully completed a contract with the agency in the past;
 2. The respondent has submitted names of other purchasers with whom they have provided service and performed satisfactorily; **OR**
 3. The respondent has posted a performance bond.
- C. Proof of Insurance:
 1. Comprehensive General Liability Insurance at a minimum of \$300,000 Combined Single Limit for Bodily Injury and Property Damage, per occurrence and aggregate.
 2. Vehicle Insurance at a minimum of \$300,000 bodily injury per person / \$500,000 bodily injury per accident / \$300,000 property damage per accident for a Split Liability Limit (SLL) policy or \$800,000 for a Combined Single Limit (CSL) policy.
 3. Workers' Compensation Insurance Coverage as required by law.
- D. A current business license and/or occupational license(s) as required by local statutes.
- E. Verification that the contractor is registered with and maintains good standing with the Secretary of State of the State of Missouri. See website: <http://s1.sos.mo.gov/>
- F. Evidence that the contractor is not on the state or federal debarment lists.
- G. Evidence of OSHA-10 Certification for all of the contractor's employees.
- H. Proof of EPA Certified Firm Certification and Certified Renovator and Lead Safe Work (LSW) training documentation, if any LSW is to be performed (Wx contractors only; not HVAC or electrical contractors).

The contractor's file should be reviewed annually to update insurance information, re-check the debarment and Secretary of State's registration lists, and verify that all other information is up-to-date.

See **Attachment 3-6** for a checklist with these requirements.

VI. Definition of a Home in Progress, a Completed Home, and an Amended Home

A. Home in Progress

A home in progress is a home for which energy conservation measures (ECMs) have actually commenced. The commencement of work does not include the hanging of smoke or carbon monoxide detectors.) **Completion of an energy audit does not constitute a work start date.**

B. Completed Home

A completed home, or unit, is a home in which all weatherization measures have been installed according to the work plan, or as documented in a change order request, the subgrantee, or its authorized representative, has conducted a final inspection and certified that the work has been completed in a professional manner, in accord with WAP work standards, and in accordance with the priority determined in 10 CFR 440. In addition, before a home is considered complete, that home must be attached to a reimbursement submitted through MoWAP and approved for payment by DED/DE staff through the MoWAP system.

10 CFR Part 440.16 (g) states the following: No dwelling unit may be reported to DOE as completed until all weatherization materials have been installed and the subgrantee, or its representative, has performed a final inspection(s) including any mechanical work performed and certified that the work has been completed in a workmanlike manner and in accordance with the priority determined by the audit procedures.

No dwelling unit may be reported as a completed unit until it meets the above criteria. Before reporting a completed home, DED/DE requires all homes pass a final inspection by subgrantees and that all invoices associated with the home have been received. Units with estimated expenses will not be reimbursed. Expenses associated with a home that fails a DED/DE inspection may be withheld from the Subgrantee's subsequent reimbursement until the home passes.

C. Amended Home

Generally, there should be no amendments made to a home after 12 months from the time the job has been reported to DED/DE. Due to WPN 11-03 (see Attachment 3-3), subgrantees may not charge the WAP for additional work on homes weatherized after January 10, 2011.

Correction amendments for financial revisions to client files are still allowed.

D. Reporting Homes

Homes may be reported as complete in one of two categories: (1) a home for which all cost-effective measures have been completed within cost guidelines, or (2) a home for which all cost-effective measures have not been completed because of a complication involving the homeowner or occupant. For example, a home may be reported as complete if the client (1) refused certain types of work dictated by the audit, (2) moved, or (3) died and material costs were incurred before all work was finished.

If at all possible, completion of WAP service will be attempted. However, for example, if the client died and the work was unable to be completed, the home may still be counted as a completed house. If the home is reported and counted as a completed home, it is ineligible for

weatherization services at a later date, even if all ECMs identified during the energy audit were not performed.

VII. Leveraging Activities

Federal regulations allow weatherization funds to be used for leveraging activities. Under leveraging, subgrantees work at developing relationships with property owners, utility companies and other entities that generate non-Federal resources for the program. Non-Federal resources are used to supplement the program and expand energy efficiency services and/or increase the number of dwelling units completed for weatherization eligible clients.

Subgrantee agencies may request up to, but no more than, five percent (5%) of their DOE grant allocation for leveraging purposes. Subgrantee requests for leveraging must include specific planned leveraging activities, targeted partners (e.g. landlords, utilities or other agencies), and estimated outcomes including dollar amounts. If agencies do not initiate meaningful leveraging activities, the funds may be considered as state carryover and may be redirected to other agencies.

Utility funds for weatherization obtained by the DED/DE through utility regulatory cases or other actions may not be reported by subgrantees as leveraged funds.

Landlord contributions are technically a form of leveraged funds but they are not a part of the grant and are not reported under leveraging activities. As described in *Section 2 – Client Services*, landlords must provide a minimum of a five percent (5%) cash contribution of estimated labor and material project costs before weatherization work can begin on a home.

Contributions received from the owner/landlord are not to be reported as Program Income and should be applied to the cost of the home being weatherized in order to reduce that home's weatherization expenditures.

The amount of contribution above the required minimum five percent (5%) cash contribution is left to the judgment of the subgrantee. These funds are not voluntary (in most instances) and, therefore, are treated differently than traditional leveraged funds. **Landlord contributions must be used to reduce the cost of the home in which the contribution was made.**

DED/DE and DOE encourage subgrantees to form partnerships with other Federal programs [10 CFR 440, Section 440.16(e)]. These funds, partnered with Weatherization funding, will supplement the Weatherization program and are not considered leveraged funds.

Generally, leveraging is not considered program income; however, program income is a form of leveraging. Leveraged resources are not considered to be program income for the purposes of the WAP. See Section 5 – Financial Management for additional leveraging information.

VIII. Monthly Reporting

10 CFR Part 440 authorizes U.S. DOE to collect such reports as it deems necessary to carry out its responsibilities.

All agencies are required to submit a monthly reimbursement request through MoWAP to the DED/DE Weatherization Program by the 10th day of each month. If an agency has no homes to

report and is requesting no financial reimbursement, e-mail notification is required to be sent to DED/DE. Subgrantees may submit multiple reimbursement requests per month.

The final reimbursement request must contain any receipts from the sale of equipment and/or vehicles that have not been used to offset program operation costs or equipment purchases. These documents must be uploaded to the reimbursement.

IX. Quarterly Reporting

Failure to submit progress and financial reports on time may result in cancellation of the subgrant agreement or other penalties as determined by DED.

All agencies are required to submit all quarterly reports for federal subgrants to the DED/DE by the **10th** day of the month following the quarterly reporting time frame. Agencies are required to submit the following quarterly reports:

- Other Fund Sources Report (Attachment 3-1)
- Woman Business Enterprise/Minority Business Enterprise (WBE/MBE) Report and Instructions (Attachment 3-2)

The quarterly reporting time frames are as follows:

- 1st Quarter July 1 – September 30, DUE October 10th
- 2nd Quarter October 1 – December 31. DUE January 10th
- 3rd Quarter January 1 – March 31 DUE April 10th
- 4th Quarter April 1 – June 30 DUE July 10th

If the 10th of the month falls on a weekend or state holiday, the due date will be the subsequent business day.

X. Annual A-133 Audit Report

A complete OMB A-133 Audit Report is due annually to DED/DE within nine months from the end of the agency's fiscal year or thirty days from the date the final report is submitted to the recipient by the independent auditor. (See Section 4 and Attachment 4-2 for specific instructions)

XI. Annual Vehicle and Equipment Inventory Report

All agencies are required to submit an annual Vehicle and Equipment Inventory Report by December 1 of each year. (See Attachment 3-4 for specific instructions.)